

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ARM LTD.,

Plaintiff,

v.

QUALCOMM INC., QUALCOMM  
TECHNOLOGIES, INC. and NUVIA, INC.,

Defendants.

C.A. No. 22-1146-MN

**JOINT STATUS REPORT**

The parties provide the following status report following the jury verdict returned on December 20, 2024 (D.I. 572) and the bench trial on certain of Defendants' equitable defenses:

**1. Judgment**

The parties have submitted competing proposed partial judgments based on the jury's answers to Questions 2 and 3 of the verdict form.

**2. Post-Trial Motions**

Plaintiff currently plans to file the following post-trial motions:

- Motions for a new trial and renewed motion for judgment as a matter of law on Count I of Arm's Complaint as to Nuvia, Inc. (Question 1 on the verdict form) and motions for a new trial and renewed motion for judgment as a matter of law on Count I of Arm's Complaint as to Qualcomm Inc. and Qualcomm Technologies, Inc. (Question 2 of the verdict form) and on Count I of Defendants' Answer and Second Amended Counterclaims (Question 3 of the verdict form).

Defendants intend to file the following post-trial motion:

- Renewed motion for judgment as a matter of law with respect to Nuvia, Inc., on Count I of Arm's Complaint.<sup>1</sup>

**3. Jury Trial – Deadlines and Page Limitations for Post-Trial Motions**

- Each side shall be limited to a total of 20 pages for its opening brief in support of all post-trial motions, regardless of how many such motions it files. Each side will be limited to 20 pages for its answering brief and 10 pages for its reply brief relating to any post-trial motions filed by either side, regardless of how many such motions are filed.
- The parties agree:
  - Renewed motions for judgment as a matter of law regarding Count I of the Complaint as to Nuvia, Inc., and any opening brief in support of such motions, shall be filed no later than January 17, 2025. Any answering brief shall be filed no later than February 14, 2025. Any reply brief shall be filed no later than February 28, 2025.
  - Arm's motions for a new trial and renewed motion for judgment as a matter of law on Count I of Arm's Complaint as to Qualcomm Inc. and Qualcomm Technologies, Inc. and on Count I of Defendants' Answer and Second Amended Counterclaims, and an opening brief in support of those motions, shall be filed within 28 days after the date of the Court's entry of partial judgment. Any answering brief shall be filed

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<sup>1</sup> Qualcomm objects to Arm's characterization of the verdict form to the extent it suggests that the jury's answer to Question 3 is relevant only to Qualcomm's claim for declaratory judgment and not to Qualcomm's liability for alleged breach of the Nuvia ALA. See D.I. 300, ¶ 145.

within 28 days after the filing of the opening brief. Any reply brief shall be filed within fourteen 14 days after the filing of the answering brief.

- The parties dispute the timing with respect to any motion for a new trial regarding Count I of the Complaint as to Nuvia, Inc.
  - **Nuvia's position** is that any such motion, and any opening brief in support of such a motion, shall be filed no later than January 17, 2025. Any answering brief shall be filed no later than February 14, 2025. Any reply brief shall be filed no later than February 28, 2025.
  - **Arm's position** is that any such motion, and any opening brief in support of such a motion, shall be filed within 28 days after the date of the Court's entry of partial judgment. Any answering brief shall be filed within 28 days after the filing of the opening brief. Any reply brief shall be filed within fourteen 14 days after the filing of the answering brief.

4. **Bench Trial - Findings of Fact and Post-Trial Briefing**

- The aforementioned deadlines do not apply to the submission of proposed findings of fact and post-trial briefing regarding Defendants' equitable defenses, which were tried to the bench.
- With respect to those defenses:
  - **Defendants' position** is that the Court's entry of partial judgment for Qualcomm will moot those defenses with respect to Qualcomm, but that those defenses will remain live with respect to Nuvia. Defendants propose that the Court defer resolution of those defenses with respect to Nuvia until after resolution of the

parties' other post-trial motions and, if a new trial is granted, after completion of that trial.

- Defendants submit that, if the Court concludes that proposed findings of fact and post-trial briefing should be submitted to the Court now:
  - Nuvia's proposed findings of fact and post-trial brief shall be filed within 28 days after the date of the Court's entry of partial final judgment. Nuvia will be limited to 10 pages for its proposed findings of fact and 10 pages for its conclusions of law.
  - Arm's response to Nuvia's proposed findings of fact and post-trial brief will be due with 28 days thereafter. Arm will be limited to 10 pages for its response to Nuvia's proposed findings of fact and 10 pages for its conclusions of law.
  - Nuvia's reply to Arm's post-trial brief will be due within 14 days thereafter and will be limited to 5 pages. No further submissions of proposed finding of fact may be submitted with Nuvia's reply.
- **Arm's position:** Arm agrees that those defenses will be moot as to Qualcomm upon entry of judgment, and the Court should defer consideration of those defenses as to Nuvia until after resolution of the parties' other post-trial motions and, if a new trial is granted, after completion of that new trial.

## **5. Mediation**

The parties are exploring options for further mediation consistent with the Court's guidance on December 20, 2024.

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*Attorneys for Defendants Qualcomm Inc.,  
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Inc.*

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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The Honorable Maryellen Noreika  
United States District Judge